

In The Matter Of:
Hodell-Natco Industries, Inc. v.
SAP America, Inc., et al.

Geoffrey Ashley
March 16, 2012

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO) Case No. 1:08 CV 2755
INDUSTRIES, INC.,)
Plaintiff,) Judge: Lesley Wells
vs.) Magistrate Judge:
SAP AMERICA, INC., et) Greg White
al.,)
Defendants.) VOLUME I

AUDIOVISUAL DEPOSITION OF GEOFFREY ASHLEY

DATE: Friday, March 16, 2012
TIME: 9:24 a.m.
PLACE: Residence Inn
91 Hall Street
Concord, New Hampshire

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1 Q The Business One software package, as I
2 understand it, was throughout 2005, 2006 and
3 actually even into 2007, targeted on the
4 small to medium-sized companies; is that
5 correct?

6 A That's correct.

7 Q And by definition, again, that SAP uses for
8 the small to mid-size or medium size is 10
9 million, 50 million is generally considered
10 small business; is that correct?

11 A That's correct.

12 Q And then 50 million to 500 million is
13 generally considered a medium-sized business?

14 A Correct.

15 Q Do you know one way or the other where
16 Hodell-Natco fits in either of those two
17 ranges? Where they fit when they were sold?

18 A Well, it's impossible to say, because it
19 includes too many variables.

20 Q No, I just said: Do they fit in small or
21 medium, or do you know?

22 MR. STAR: He's talking about the
23 revenue side.

24 A Oh, yeah. From a marketing standpoint, they
25 would fit in a medium size.

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1 Q Okay. That's what I'm saying. So this --
2 from a marketing standpoint, the Business One
3 product was targeted for the Hodell-Natco
4 size company?

5 A From a marketing standpoint, correct.

6 Q Right. Okay. Would you go to Exhibit 81,
7 please, at the top of the first page?

8 THE COURT REPORTER: Could I just have
9 one minute?

10 MR. HULME: Sure.

11 A Um-hum.

12 Q It's an e-mail from Dan Lowery to you, Dirk
13 and Ralf, right?

14 A Correct.

15 Q In that Mr. Lowery states, "Here is the
16 decision criteria used when they made the
17 decision to buy SAP." They're referring to
18 Hodell's experience.

19 A Right.

20 Q "First, Hodell is viewed as one of the best
21 ranked companies in the industry, well
22 respected by all."

23 Do you have any reason to disagree with
24 that statement?

25 A I do not.